



Louisville Metro Air Pollution Control District  
850 Barret Avenue  
Louisville, Kentucky 40204-1745



## **Federally Enforceable District Origin Operating Permit (FEDOOP)**

Permit No.: 124-97-F (R4)

Plant ID: 168

Effective Date: xx/xx/2013

Expiration Date: xx/xx/2018

Fee: \$

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

PPG Architectural Finishes Inc.  
6804 Enterprise Drive  
Louisville, KY 40233

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	VOC	PM	HAP
Tons/year:	<100	<50	<10 and 25

Permit Writer: Shannon Hosey

Public Notice Date: 5/1/2013

Proposed Permit Date: 5/1/2013

{manager1}  
Air Pollution Control Officer  
{date1}

## Table of Contents

FEDOOP Permit Revisions/Changes.....	3
Abbreviations and Acronyms .....	4
General Conditions .....	5
Emission Unit U1.....	8
U1 EU License No.: 31063, 31064, 31061, 31066, 31067, 31068, 30548, 28756, 30549, 35315, and 37164.....	8
U1 Unit Description:.....	8
U1 Applicable Regulations:.....	8
U1 Equipment:.....	9
U1 Control Devices: .....	12
U1 Specific Conditions .....	12
U1 Comments .....	18
Emission Unit U2.....	19
U2 EU License No.: 31062, 30165, 31069, 31070, 31071, 31073, 31074, 30550 and 30551.....	19
U2 Unit Description:.....	19
U2 Applicable Regulations:.....	19
U2 Equipment: .....	20
U2 Control Devices: .....	21
U2 Specific Conditions .....	22
U2 Comments .....	24
Emission Unit IA1 .....	25
IA1 EU License No.: 31072 and 31075.....	25
IA1 Unit Description: .....	25
IA1 Applicable Regulations:.....	25
IA1 Equipment:.....	25
IA1 Control Devices: .....	25
IA1 Specific Conditions.....	26
IA1 Comments .....	28
Insignificant Activities.....	29

**FEDOOP Permit Revisions/Changes**

<b>Revision No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Type</b>	<b>Attachment No./ Page No.</b>	<b>Description</b>
N/A	07/31/1998	06/14/1998	Initial	Entire Permit	Initial Permit Issuance
R1	04/04/2000	03/05/2000	Minor	General Conditions Pages 2-4	Incorporate revisions to General Conditions #4, #11, #12, and #13; New General Conditions #13 and #14
R2	01/27/2003	NA	Admin	Front Page – Permit expiration date	Correct expiration date to correspond to 5-year permit term
R3	03/31/2004	12/21/2003	Renewal	Entire Permit	Scheduled Permit Renewal; Incorporate Construction permit 353-03-C
R4	xx/xx/2013	05/01/2013	Renewal	Entire Permit	Scheduled Permit Renewal; Incorporate Construction permits 194-04-C, 221-04-C, 252-05-C, 364-06-C, 35315-12-C and 37164-13-C

<b>Application</b>	<b>Receipt Date</b>	<b>Application Number</b>
Construction Permit – 194-04-C – One (1) paint filling line to transfer final product into five-gallon containers.	01/04/1993	30548
Construction Permit – 221-04-C – One (1) Thindown tank, capacity 11,546 gallons.	12/09/2004	30549
Construction Permit – 252-05-C – One (1) 12,000-gallon fixed-roof storage tank (Resydrol).	05/26/2005	30550
Construction Permit – 364-06-C – Two (2) fixed-roof storage vessels (10,800 gallons each) for storing UCAR Latex 626 and UCAR Latex 379G.	11/07/2006	30551
Construction of paint filling lines and sand blast equipment (existing equipment discovered on inspection)	02/25/2010	28756
Application to relocate caulk manufacturing system.	05/31/2012	35315
Application for One (1) 3300 gallon dispersion tank, one (1) 200 HP Hockmeyer disperser and one (1) Neupack one-gallon filling line. Construction Permit 37164-13-C	03/08/2013	37164
FEDOOP Renewal Application	02/11/2002	27728

### Abbreviations and Acronyms

AP-42	- <b>AP-42</b> , <i>Compilation of Air Pollutant Emission Factors</i> , published by USEPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Background Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
FEDOOP	- Federally Enforceable, District Origin Operating Permit
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- hour
in.	- inches
lbs	- pounds
l	- liter
LMAPCD	- Louisville Metro Air Pollution Control District
mm <sub>Hg</sub>	- millimeters of mercury column height
MM	- million
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- pounds per square inch absolute
QA	- Quality Assurance
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- water column
year	- any period of twelve consecutive months, unless "calendar year" is specified
yr	- year, or any 12 consecutive-month period, as determined by context

### General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District [Form 9440-0](#).
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or an anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, sulfur dioxide, carbon monoxide, photochemical oxidants, hydrocarbons, nitrogen oxides, lead, gaseous fluorides, or Volatile Organic Compounds (VOC) as listed in District Regulation 3.04; any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gases whose combined global warming potential equals or exceeds 100,000 tons CO<sub>2</sub>-equivalent, as defined in 40 CFR 98 (except that prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include biogenic carbon dioxide emissions defined in 40 CFR 52.21(b)(49)(ii)(a)).

Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.01	General Provisions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District  
Room 205  
850 Barret Ave  
Louisville, KY 40204-1745***

**Emission Unit U1**

**U1 EU License No.:** 31063, 31064, 31061, 31066, 31067, 31068, 30548, 28756, 30549, 35315, and 37164

**U1 Unit Description:**

Forty-four (44) tinting/thinning tanks in stain manufacturing area. (Permit 11-74)

Four (4) Myers pigment dispersers employing mineral spirits. Pigment dust to be controlled by an existing bag collector. System includes four (4) 1000 gal tanks each, four (4) 600 gal tanks each, and one (1) 250 gal tank. (Permit 12-74)

Latex Production: Three (3) Myers dispersers of the following capacities; one (1) 1000 gal, one (1) 250 gal and one (1) 100 gal. Pigment is controlled by Torit dust collector. Three (3) holding tanks 2,000 gal each for rinsing & cleaning operations. (Permit 408-74)

Twenty-two (22) 3300 gal latex and finishing tanks used for latex coating production, two (2) 450 gal tanks each, one (1) 600 gal tank, and one (1) 12,000 gal Masterbatch blending tank. (Permit 410-74)

One (1) Ambrose paint filling line to transfer final product into five-gallon containers (Construction Permit 194-04-C).

Small Can, F-Style, Machine 1, Machine 2, Machine 4 and Neupack 5 paint filling lines and sand blast equipment (existing equipment discovered on inspection)

One (1) Masterbatch Thindown tank, capacity 11,546 gal (Construction Permit 221-04-C).

One (1) caulk mixing system, comprised of mix head and formulating vessels and one (1) cartridge type dust collector, Torit model #90 (Construction Permit 35315-12-C)

One (1) 3300 gallon dispersion tank, one (1) 200 HP Hockmeyer disperser and one (1) Neupack one-gallon filling line. (Construction Permit 37164-13-C)

**U1 Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
6.09	Standards of Performance for Existing Process Operations	1 through 3
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 5

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for new Process Operations	1 through 4
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

**U1 Equipment:**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E1	Tinting/Thinning Tank 1800 Gallons	6.24	NA
E2	Tinting/Thinning Tank 1800 Gallons		
E3	Tinting/Thinning Tank 3300 Gallons		
E4	Tinting/Thinning Tank 3300 Gallons		
E5	Tinting/Thinning Tank 3300 Gallons		
E6	Tinting/Thinning Tank 3300 Gallons		
E7	Tinting/Thinning Tank 3300 Gallons		
E8	Tinting/Thinning Tank 3300 Gallons		
E9	Tinting/Thinning Tank 3300 Gallons		
E10	Tinting/Thinning Tank 3300 Gallons		
E11	Tinting/Thinning Tank 7000 Gallons		
E12	Tinting/Thinning Tank 7000 Gallons		
E13	Tinting/Thinning Tank 7000 Gallons		
E14	Tinting/Thinning Tank 7000 Gallons		
E15	Tinting/Thinning Tank 1500 Gallons		
E16	Tinting/Thinning Tank 1500 Gallons		
E17	Tinting/Thinning Tank 600 Gallons		

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E18	Tinting/Thinning Tank 500 Gallons		
E19	Tinting/Thinning Tank 500 Gallons		
E20	Tinting/Thinning Tank 500 Gallons		
E21	Tinting/Thinning Tank 500 Gallons		
E22	Tinting/Thinning Tank 500 Gallons		
E23	Tinting/Thinning Tank 500 Gallons		
E24	Tinting/Thinning Tank 500 Gallons		
E25	Tinting/Thinning Tank 500 Gallons		
E26	Tinting/Thinning Tank 500 Gallons		
E27	Tinting/Thinning Tank 500 Gallons		
E28	Tinting/Thinning Tank 500 Gallons		
E29	Tinting/Thinning Tank 500 Gallons		
E30	Tinting/Thinning Tank 500 Gallons		
E31	Tinting/Thinning Tank 500 Gallons		
E32	Tinting/Thinning Tank 500 Gallons		
E33	Tinting/Thinning Tank 2500 Gallons		
E34	Tinting/Thinning Tank 2500 Gallons		
E35	Tinting/Thinning Tank 2500 Gallons		
E36	Tinting/Thinning Tank 2500 Gallons		
E37	Tinting/Thinning Tank 2500 Gallons		
E38	Tinting/Thinning Tank 2500 Gallons		
E39	Tinting/Thinning Tank 2500 Gallons		
E40	Tinting/Thinning Tank 2500 Gallons		
E41	Tinting/Thinning Tank 2500 Gallons		
E42	Tinting/Thinning Tank 2500 Gallons		
E43	Tinting/Thinning Tank 2500 Gallons		
E44	Tinting/Thinning Tank 2500 Gallons		
E45	Pigment Disperser Myers 100 HP	6.09 and 6.24	C1
E46	Pigment Disperser Myers 100 HP		
E47	Pigment Disperser Myers 50 HP		
E48	Pigment Disperser Myers 50 HP		

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E49	Tank 1000 Gallon		NA
E50	Tank 1000 Gallon		
E51	Tank 1000 Gallon		
E52	Tank 1000 Gallon		
E53	Tank 600 Gallon		
E54	Tank 600 Gallon		
E55	Tank 600 Gallon		
E56	Tank 600 Gallon		
E57	Tank 250 Gallon		
E58	Disperser Myers 100 HP	6.09 and 6.24	C2
E59	Disperser Myers 100 HP		
E60	Disperser Myers 50 HP		
E61	Holding Tank 2,000 Gallon		NA
E62	Holding Tank 2,000 Gallon		
E63	Holding Tank 2,000 Gallon		
E64	Latex and Finishing Tank 3300 Gallon	6.24	NA
E65	Latex and Finishing Tank 3300 Gallon		
E66	Latex and Finishing Tank 3300 Gallon		
E67	Latex and Finishing Tank 3300 Gallon		
E68	Latex and Finishing Tank 3300 Gallon		
E69	Latex and Finishing Tank 3300 Gallon		
E70	Latex and Finishing Tank 3300 Gallon		
E71	Latex and Finishing Tank 3300 Gallon		
E72	Latex and Finishing Tank 3300 Gallon		
E73	Latex and Finishing Tank 3300 Gallon		
E74	Latex and Finishing Tank 3300 Gallon		
E75	Latex and Finishing Tank 3300 Gallon		
E76	Latex and Finishing Tank 3300 Gallon		
E77	Latex and Finishing Tank 3300 Gallon		
E78	Latex and Finishing Tank 3300 Gallon		
E79	Latex and Finishing Tank 3300 Gallon		

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E80	Latex and Finishing Tank 3300 Gallon		
E81	Latex and Finishing Tank 3300 Gallon		
E82	Latex and Finishing Tank 3300 Gallon		
E83	Latex and Finishing Tank 3300 Gallon		
E84	Latex and Finishing Tank 3300 Gallon		
E85	Latex and Finishing Tank 3300 Gallon		
E86	Blending Tank 450 Gallon		
E87	Blending Tank 450 Gallon		
E88	Blending Tank 600 Gallon		
E89	Blending Tank 12,000 Gallon		
E90	Ambrose Paint Filling Line	7.25	NA
E91	Small Can Filling Line		
E92	F-Style Container Filling Line		
E93	Machine 1 Gallon Filling Line		
E94	Machine 2 Gallon Filling Line		
E95	Machine 4 Gallon Filling Line		
E96	Neupak 5 Gallon Filling Line		
E97	Sand Blaster	7.08	NA
E98	Thindown Tank 11,546 Gallons	7.25	
E99	Caulk Mixing System with Dust Collector	7.08 and 7.25	C3
E100	3300 gallon dispersion tank with a 200 HP Hockmeyer disperser	7.08 and 7.25	C3
E101	Neupack one-gallon filling line	7.25	NA

**U1 Control Devices:**

<b>Control Device ID</b>	<b>Description Make/Model</b>	<b>Performance Indicator</b>	<b>Stack ID</b>
C1	Torit Cartridge Dust Collector Model #DFT4	N/A	S1
C2	Torit Cartridge Dust Collector Model #DFT4	N/A	S2
C3	Torit Cartridge Dust Collector Model #90	N/A	S3

**U1 Specific Conditions**

**S1. Standards** (Regulation 2.17, section 5.2)**a. VOC**

- i. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 100 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1)
- ii. For Emission Points E90, E91, E92, E93, E94, E95, E96, E98, E100, and E101 the owner or operator shall not allow or cause plant-wide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 to equal or exceed 5 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1)
- iii. For Emission Point E99, the owner or operator shall limit the total VOC emissions to less than 5 tons per 12 consecutive months. (Regulation 7.25, Section 3) (See Comment 2)
- iv. The owner or operator shall not discharge into the atmosphere more than forty (40) pounds of VOC in any one day, nor more than eight (8) pounds in any one hour, from any existing affected facility in which any Class II solvent is used unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.2)
- v. The owner or operator shall not discharge into the atmosphere more than three thousand (3,000) pounds of VOC in any one day, nor more than four hundred fifty (450) pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.3)

**b. Opacity**

- i. For Emission Points E45, E46, E47, E48, E58, E59, and E60, the owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1)
- ii. For Emission Point E97, E99, and E100, the owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

c. **PM**

- i. For Emission Points E45, E46, E47, E48, E58, E59, and E60, the owner or operator shall not allow PM emissions to exceed 7.25 lb/hr. (Regulation 6.09, section 3.2) (See Comment 1)
- ii. For Emission Point E97, the owner or operator shall not allow PM emissions to exceed 2.34 lb/hr. (Regulation 7.08, section 3.1.2) (See Comment 1)
- iii. For Emission Points E99 and E100, the owner or operator shall not allow PM emissions to exceed 2.34 lb/hr. (Regulation 7.08, section 3.1.2)
- iv. The owner or operator shall limit the total plant-wide PM emissions from the plant to less than 50 tons per 12 consecutive months. (Regulation 2.17, section 5.1)

d. **HAP**

- i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 10 tons during any consecutive 12-month period.
- ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 25 tons during any consecutive 12-month period.

e. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

S2. **Monitoring and Record Keeping** (Regulation 2.17, section 5.2)

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. **VOC**

The owner or operator shall calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.

The owner or operator shall maintain the following records to demonstrate ongoing compliance with Regulation 6.24, Section 3:

- i. The hours of operation of the equipment or usage for each day;
- ii. The daily amount used in gallons of each solvent, cleaner, etc; and
- iii. Monthly calculations showing the average hourly and daily VOC emissions.

For Emission Point E99 under the BACT analysis submitted by the source and approved by the District, the owner and operator shall:

- i. Maintain records, monthly, indicating that the ingredients, containing VOCs were inspected and that they arrived in sealed containers;
- ii. Maintain records, monthly, of the line and hose containing VOCs inspections where ingredients are transferred; and
- iii. Maintain records of any corrective action taken.

For Emission Points E90, E91, E92, E93, E94, E95, E96, E98, E100, and E101 subject to Regulation 7.25:

- i. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.
- ii. The owner or operator shall calculate the VOC emissions during the 12 consecutive month period to demonstrate compliance with Specific Condition S1.ii.

**b. Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission

point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **PM**

- i. For Emission Points E99 and E100, the owner or operator shall, monthly, perform visual inspection of the structural and mechanical integrity of Torit dust collector for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.
- ii. The owner or operator shall, monthly, calculate and record the monthly and 12-consecutive month PM emissions to demonstrate compliance with the less than 50 ton per 12-consecutive months plant-wide emission limit.

d. **HAP**

The owner or operator shall calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

e. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

S3. **Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall submit annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.17, section 3.5.

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete”.
- Signature and title of the responsible official of the company.

The compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through December 31 <sup>st</sup>	March 1 <sup>st</sup>

a. **VOC**

The owner or operator shall report the following information:

- i. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- ii. Identification of all periods of exceedance of the VOC emissions limits; and
- iii. A description of corrective actions taken for each exceedance.

b. **HAP**

The owner or operator shall report the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

c. **Opacity**

- i. Identification of all periods of exceedances;
- ii. The number of surveys where visible emissions were observed;
- iii. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- iv. Description of any corrective action taken for each exceedance.
- v. A negative declaration if there were no exceedances.

d. **PM**

For Emission Points E99 and E100:

- i. Identification of all periods of exceedances of the plant-wide PM limit including the quantity of excess emissions;
- ii. Reasons for excess emissions;
- iii. Description of any corrective action taken to prevent future exceedances; and
- iv. A negative declaration if there were no exceedances.

e. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not

limited to, control device upset conditions.

- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.e.ii.

### **U1 Comments**

- 1. The District has performed a one-time PM compliance demonstration for this equipment and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.
- 2. The source has submitted a BACT analysis for the caulk system equipment (E99) on May 20, 2003. The District has approved the analysis and established a less than 5 ton per year VOC limit.

**Emission Unit U2**

**U2 EU License No.:** 31062, 30165, 31069, 31070, 31071, 31073, 31074, 30550 and 30551

**U2 Unit Description:**

Six (6) above-ground solvent storage tanks (Permit 10-74) as follows: Exterior Storage Tank #1 14,000 Gallons, Exterior Storage Tank #2 14,000 Gallons, Exterior Storage Tank #3 14,000 Gallons, Exterior Storage Tank #5 20,000 Gallons, Exterior Storage Tank #6 20,000 Gallons, Exterior Storage Tank #9 20,000 Gallons

Six (6) storage tanks (Permit 407-74) as follows: Interior Storage Tank #15 12,000 Gallons, Interior Storage Tank #16 12,000 Gallons, Interior Storage Tank #20 10,000 Gallons, Interior Storage Tank #18 10,000 Gallons, Interior Storage Tank #17 10,000 Gallons, Interior Storage Tank #19 10,000 Gallons

Two (2) Double compartment holding tanks with four (4) 2,000 gal each storage compartments. Tanks 21, 22, 23, and 24 (Permit 326-80)

Four (4) above-ground storage tanks with submerged fill pipes: (Permit 190-90) (Construction Permit 353-03) Exterior Storage Tank #7 20,000 Gallons, Exterior Storage Tank #8 20,000 Gallons, Exterior Storage Tank #4 20,000 Gallons, Interior Storage Tank #14 12,000 Gallon with submerged fill pipes

Two (2) raw material storage tanks (Permit 277-90). Interior Storage Tank #25 12,000 Gallons, Interior Storage Tank #26 12,000 Gallons

Two (2) bulk storage tanks, (Permit 6-99) Interior Storage Tank #11 6,800 Gallons, Interior Storage Tank #12 6,800 Gallons

One (1) above-ground outside storage tank with submerged fill, 20,000 gal capacity, (Permit 75-01) Tank 10

One (1) fixed-roof storage tank Construction Permit – 252-05-C) Interior Storage Tank #27 12,000 Gallons

Two (2) 10,800 gal fixed-roof storage vessels (Construction Permit – 364-06-C) Interior Storage Tank #28 10,800 Gallons, Interior Storage Tank #29 10,800 Gallons

**U2 Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4, 5, 7 & 8
40 CFR 60 Subpart Kb	Federal New Source Performance Standards for VOC Liquid Storage Vessels	60.113(b), 60.115(b) and 60.116(b)

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

**U2 Equipment:**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E102	Exterior Storage Tank #2 14,000 Gallons	6.13	N/A
E103	Exterior Storage Tank #3 14,000 Gallons		
E104	Exterior Storage Tank #1 14,000 Gallons		
E105	Exterior Storage Tank #5 20,000 Gallons		
E106	Exterior Storage Tank #6 20,000 Gallons		
E107	Exterior Storage Tank #9 20,000 Gallons		
E108	Interior Storage Tank #15 12,000 Gallons		
E109	Interior Storage Tank #16 12,000 Gallons		
E110	Interior Storage Tank #20 10,000 Gallons		
E111	Interior Storage Tank #18 10,000 Gallons		
E112	Interior Storage Tank #17 10,000 Gallons		
E113	Interior Storage Tank #19 10,000 Gallons		
E114	Double Compartment Holding Tanks #21 & 22 with 2000 Gallon Storage Compartments	7.12	

Emission Point ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E115	Double Compartment Holding Tanks #23 & 24 with 2000 Gallon Storage Compartments		
E116	Exterior Storage Tank #7 20,000 Gallons		
E117	Exterior Storage Tank #8 20,000 Gallons		
E118	Exterior Storage Tank #4 20,000 Gallons		
E119	Interior Storage Tank #14 12,000 Gallon with submerged fill pipes		
E120	Interior Storage Tank #25 12,000 Gallons		
E121	Interior Storage Tank #26 12,000 Gallons		
E122	Interior Storage Tank #11 6,800 Gallons		
E123	Interior Storage Tank #12 6,800 Gallons		
E124	Exterior Storage Tank #10 20,000 Gallon with submerged fill pipes	40 CFR 60 Subpart Kb	
E125	Interior Storage Tank #27 12,000 Gallons	7.12	
E126	Interior Storage Tank #28 10,800 Gallons		
E127	Interior Storage Tank #29 10,800 Gallons		

**U2 Control Devices:**

There are no control devices associated with Emission Unit U2.

**U2 Specific Conditions****S1. Standards (Regulation 2.17, section 5.2)****a. VOC**

- i. The owner or operator shall not store VOC materials with an as stored vapor pressure of greater than or equal to 1.5 psia in the storage vessel(s), unless the storage tank is equipped with a permanent submerged fill pipe. (Regulation 6.13 and 7.12, section 3.3)
- ii. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 100 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1)

**b. HAP**

- i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 10 tons during any consecutive 12-month period.
- ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 25 tons during any consecutive 12-month period.

**c. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S1. Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. VOC**

- i. The owner or operator of the storage vessel(s) shall maintain records of the material stored and the vapor pressure in each storage vessel and if the contents of the storage vessel(s) are changed a record shall be made of the new contents, the new vapor pressure, and the date of the change in order to demonstrate compliance with Specific Condition S1.
- ii. The owner or operator shall keep a record that shows if the storage vessel is equipped with a submerged fill pipe. Submerged fill pipe means any fill

pipe the discharge of which is entirely submerged when the liquid level is 6 inches above the bottom of the tank; or when applied to a tank which is loaded from the side, shall mean every fill pipe the discharge opening of which is entirely submerged when the liquid level is 2 times the fill pipe diameter above the bottom of the tank.

**b. HAP**

The owner or operator shall calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

**c. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S2. Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.17, section 3.5.

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete”.
- Signature and title of the responsible official of the company.

The compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through December 31 <sup>st</sup>	March 1 <sup>st</sup>

**a. VOC**

- i. The emission unit ID numbers and emission point ID numbers;
- ii. The beginning and ending date of the reporting period;
- iii. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;

- iv. Identification of all periods of exceedance of the VOC emissions limits; and
- v. A description of corrective actions taken for each exceedance.

b. **HAP**

The owner or operator shall report the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

c. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.

**U2 Comments**

- 1. For storage vessel E124, Regulation 40 CFR Part 60 Subpart Kb applies due to the size of the tank, but since the vapor pressure as stored is less than 1.5 psia there are no applicable standards.

**Emission Unit IA1****IA1 EU License No.:** 31072 and 31075**IA1 Unit Description:**

Two (2) Selig Chemical Industries model # Recovery 80 maintenance parts washers.

Two (2) cold solvent cleaning equipments with secondary reservoirs.

**IA1 Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
6.18	Standards of Performance for new Process Operations	1 through 4

**IA1 Equipment:**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E128	Selig Chemical Industries Parts Washer	6.18	N/A
E129	Selig Chemical Industries Parts Washer		
E130	Parts Washer with Secondary Reservoirs		
E131	Parts Washer with Secondary Reservoirs		

**IA1 Control Devices:**

There are no control devices associated with Emission Unit IA1.

**IA1 Specific Conditions****S1. Standards (Regulation 2.17, section 5.2)****a. VOC**

- i. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)
  - 1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)
  - 2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)
  - 3) A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition S1.a.ii. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)
  - 4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)
  - 5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)
  - 6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)
- ii. The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)

- 1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)
  - 2) The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)
  - 3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)
  - 4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)
  - 5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)
  - 6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)
  - 7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)
- iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). (Regulation 6.18, section 4.3.2)

**S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. VOC**

- i. The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)

- 1) The name and address of the solvent supplier,
- 2) The date of the purchase,
- 3) The type of the solvent, and
- 4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

- ii. All records required in Specific Condition S2.a.i. shall be retained for 5 years and made available to the District upon request. (Regulation 6.18, section 4.4.3)

### S3. Reporting (Regulation 2.17, section 5.2)

The owner or operator shall submit annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.17, section 3.5.

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete”.
- Signature and title of the responsible official of the company.

The compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through December 31 <sup>st</sup>	March 1 <sup>st</sup>

#### a. VOC

There are no routine compliance reporting requirements for Regulation 6.18.

### IA1 Comments

The parts washers under this unit meet the definition of insignificant activities per Regulation 2.16, section 1.23. However, Regulation 6.18 applies to each cold cleaner that use VOC to remove soluble impurities from metal surfaces. These parts washers shall meet the requirements under Regulation 6.18.

### Insignificant Activities

- 1) Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- 2) Activities identified In District Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source.
- 3) For all insignificant activities that emit regulated air pollutants for which the company has accepted a plant-wide synthetic minor limit, the company shall maintain sufficient records to calculate the emissions and report those emissions in the annual compliance reports.

Description	Quantity	Basis
Brazing, soldering, or welding equipment, potential emissions less than 5 tpy of a regulated pollutant or 1000 lbs/year of a HAP	1	Regulation 2.02, section 2.3.4
Woodworking, except for conveying hogging or burning wood/sawdust	1	Regulation 2.02, section 2.3.5
Cold solvent parts cleaners (See Emission Unit IA1)	4	Regulation 2.02, section 2.3.15
Laboratory ventilating and exhausting systems which are not used for radioactive air contaminants	1	Regulation 2.02, section 2.3.11
Dust or particulate collectors that are located in-doors, vent directly indoors into the work space, collect no more than one ton of material per year and do not collect materials listed in Regulation 5.11, 5.12 or 5.14	1	Regulation 2.02, section 2.3.21